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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

BENT CORYDON,)	CASE NO. C 694401
)	
Plaintiff,)	THIRD AMENDED COMPLAINT FOR
)	LIBEL; SLANDER; LIBEL PER SE;
v.)	SLANDER PER SE; INTERFERENCE
)	WITH ECONOMIC ADVANTAGE;
CHURCH OF SCIENTOLOGY)	INTERFERENCE WITH CONTRACTUAL
INTERNATIONAL, INC.; AUTHOR)	RELATIONS; INTENTIONAL
SERVICES, INC.; AUTHOR FAMILY)	INFLECTION OF EMOTIONAL
TRUST; ESTATE OF L. RON)	DISTRESS; NEGLIGENT INFLECTION
HUBBARD; HEBER JENTZSCH;)	OF EMOTIONAL DISTRESS
SHIRLEY YOUNG; DAVID MISCAVIGE;)	
TIMOTHY BOWLES; BRAD)	
BALLENTINE; WARREN MCSHANE)	
and DOES 1 through 100,)	
inclusive,)	
)	
Defendants.)	

21
22 Plaintiff BENT CORYDON alleges as follows:

23
24 1. Plaintiff BENT CORYDON is an individual domiciled in
25 the State of California, County of Riverside.

26
27 2. Plaintiff is informed and believes and thereon alleges
28 that Defendant CHURCH OF SCIENTOLOGY INTERNATIONAL, INC. was at

EXHIBIT B

1 all times herein mentioned, a California corporation duly
2 authorized to do, and doing, business in the State of California,
3 County of Los Angeles.

4
5 3. Plaintiff is informed and believes, and thereon
6 alleges, that Defendants AUTHOR FAMILY TRUST, ESTATE OF L. RON
7 HUBBARD and AUTHOR SERVICES, INC., and each of them, are entities
8 duly formed and operating under the laws of the State of
9 California conducting business and other activities in the County
10 of Los Angeles.

11
12 4. Plaintiff is informed and believes, and thereon
13 alleges, that Defendants DAVID MISCAVIGE, HEBER JENTZSCH, SHIRLEY
14 YOUNG and TIMOTHY BOWLES, and each of them, are individuals
15 operating in the County of Los Angeles as agents, partners,
16 members or employees of Defendant CHURCH OF SCIENTOLOGY
17 INTERNATIONAL, INC. (hereinafter referred to as Defendant
18 "Church").

19
20 5. The Complaint has previously been amended to name Doe
21 Defendants 1 and 2 as NORMAN STARKEY and LYMAN SPURLOCK,
22 respectfully, who shall hereinafter be referred in their real
23 capacities. An amendment naming Doe No. 3 as BRIDGE
24 PUBLICATIONS, INC., has been filed concurrently with this
25 Complaint and BRIDGE PUBLICATIONS shall be named herein in its
26 true capacity and is included as one of the Church Defendants.

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1 6. The true names, identities or capacities, whether
2 individual, associate, corporate or otherwise, of Defendants DOES
3 3 through 100, are unknown to Plaintiff, who therefore sues said
4 Defendants by such fictitious names. When the true names,
5 identities or capacities of such fictitiously designated
6 Defendants are ascertained, Plaintiff will seek leave of Court to
7 amend this Complaint to insert the true names, identities and
8 capacities, together with the proper supporting charging
9 allegations.

10
11 7. Plaintiff is informed and believes and thereon alleges
12 that each of the individual Defendants designated as a DOE is a
13 participant in a conspiracy presently directed by the Managing
14 Agents of Scientology (as hereinafter defined). The acts of said
15 conspiracy continue to the present day. The conspirators include
16 the Managing Agents, the several Scientology corporations acting
17 as a single entity, and various individuals, including, the
18 individual Defendants.

19
20 8. Alternatively, at all times herein mentioned each of
21 the Defendants, including the DOES, was the agent, servant,
22 employee, fellow member, associate and/or joint venturer or
23 conspirator of each of the other remaining Defendants and was at
24 all times acting within the purpose and scope of said agency,
25 employment or joint venture and acting with the express and/or
26 implied knowledge or consent of the remaining Defendants, and
27 each of them. The acts of each Defendant were approved and/or
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EXHIBIT B

1 ratified by each other Defendant and, together, constitute a
2 single course of conduct.

3
4 9. The business of the CHURCH OF SCIENTOLOGY
5 INTERNATIONAL, INC. (hereinafter "the Church") and its affiliated
6 entities as more fully described hereinafter, is the marketing
7 and selling Dianetics and other the books of L. Ron Hubbard;
8 profiting from such sales; marketing an extraordinarily expensive
9 series of courses and counseling sessions by using fraudulent
10 guarantees of improved intelligence, health and well-being.
11 Through these counseling sessions, personal secrets are divulged
12 in a confessional fashion and mind control techniques are
13 utilized which entrap people into spending even more money on
14 more courses and auditing, and in many instances, to persuade
15 them into deserting their families and turn them into drones for
16 Scientology. Persons who become such drones by joining the staff
17 of one of the many subordinate organizations of Scientology are
18 subject to further degradation for failure to meet goals set for
19 sales of courses, clerical jobs, menial tasks - none of which are
20 doctrinal in nature. Such degradation includes imprisonment at
21 secret Scientology facilities, sleep deprivation, food
22 deprivation and physical punishment, i.e., running around a flag
23 pole for 10 hours a day.

24
25 10. Once a person who has fallen under this scheme seeks to
26 disassociate from it or rebels, the Church uses various
27 techniques including, but not limited to, threat of disclosure of
28 / / /

EXHIBIT B

1 the privileged information in confessional files to blackmail and
2 control such traitors pursuant to the Church's fair game policy.

3
4 11. Plaintiff further alleges that the designation of any
5 Scientology entity as a church and/or non-profit entity is a sham
6 and is designed solely to exploit the protections of the First
7 Amendment, to obtain tax exemptions, to prevent the regulation
8 of SCIENTOLOGY "counselors" or "counseling techniques" by state
9 regulatory agencies.

10
11 12. Prior to his death in 1986, L. Ron Hubbard personally
12 managed, directly or through subordinates, the entire SCIENTOLOGY
13 enterprise including Defendants CHURCH, ASI, AUTHOR FAMILY TRUST
14 and other entities including Religious Technology Centers (RTC),
15 Scientology Missions International (SMI), etc. His management
16 design was to ignore the formal structure of the several entities
17 and to operate them as his personal domain and he did so. The
18 goal of this management technique was, first and foremost, to
19 optimize Hubbard's personal income in violation of the
20 prohibition against personal inurement imposed on institutions
21 seeking charitable, religious, tax exempt status under
22 I.R.C. § 501(c).

23
24 13. This style of management also permits money to be
25 shifted among entities to hide their profit making reality.
26 Furthermore, insofar as actual control of the entities were/are
27 in the hands of an individual who was not within the formal

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EXHIBIT B

1 corporate structure, the conduct of affairs of each of the
2 several entities could be kept secretive.
3

4 14. Subsequent to HUBBARD's death, the control of
5 Scientology passed from Hubbard to DAVID MISCAVIGE, NORMAN
6 STARKEY, and LYMAN SPURLOCK (hereinafter sometimes referred to as
7 "Scientology Managing Agents").
8

9 15. The corporate defendants, including ASI, shall
10 hereinafter be referred to jointly as the Church Defendants.
11

12 16. From the period in or about 1962 until 1986 Plaintiff
13 was a member of Defendant CHURCH. Plaintiff was duly
14 indoctrinated into the Defendant CHURCH by regular and active
15 recruitment techniques which involved claims that the programs
16 and doctrines offered by Defendant CHURCH would raise his
17 intelligence quotient to that of genius, prevent illnesses in
18 participants and other attractive occurrences. Plaintiff paid
19 substantial consideration to Defendant CHURCH for these programs.
20

21 17. In or about 1970, Plaintiff, having qualified for and
22 achieved the highest status of counselor and minister within
23 Defendant CHURCH, started his own franchise "mission" in
24 Riverside, California. Said mission was purchased and subsidized
25 wholly and exclusively with Plaintiff's monies and assets, and
26 operated as an autonomous entity entirely independent of
27 Defendant CHURCH under the general doctrine of Scientology.
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1 18. In or about 1973, said franchise experienced rapid
2 growth and widespread success. By 1977 said franchise had 180
3 full-time staff members. At all times, Plaintiff's personal
4 assets, money and investments were used to support said franchise
5 enabling it to prosper and grow.

6
7 19. "Fair Game" is a Defendant CHURCH doctrine and policy
8 directing that any individual or employee who expresses a lack of
9 loyalty or a refusal to comply with CHURCH policy or the orders
10 of any of the Managing Agents or their subordinates is open to
11 any form of harassment, economic ruin or subject to any covert or
12 notorious plan purposely designed to cause emotional and physical
13 harm and/or financial ruin no matter how invasive or despicable
14 the method employed. This CHURCH doctrine champions the
15 destruction of an individual's business or reputation, by a
16 variety of tactics including framing false charges of criminal
17 acts, intentional interference with business contracts, and with
18 personal relationships, and other intentional acts.

19
20 20. In 1981, because of alleged infractions of CHURCH
21 rules, Plaintiff was coerced by the CHURCH Defendants, acting by
22 and through certain individual Scientologists, to sign over and
23 transfer his Riverside franchise to Defendants so as to avoid the
24 plight of "Fair Game." Plaintiff was not permitted to return to
25 control in Riverside until November 1981.

26
27 21. In 1980, while Plaintiff was attempting to prove he was
28 a worthy Scientologist so he could recover his right to the

EXHIBIT. B

1 Riverside mission, Plaintiff was arrested and pleaded guilty to
2 assault charges. Those charges arose when Plaintiff was
3 investigated in connection with widespread loan fraud by CHURCH
4 entities.

5
6 22. In order to obtain or maintain a franchise within
7 Defendant CHURCH, it is required that the franchisee be free of
8 any criminal record. Defendant, HEBER JENTZSCH, President of The
9 Church of Scientology International was present when Plaintiff
10 personally handed over documents and communicated to
11 representatives of the Church Defendants that his record had been
12 wholly expunged for the 1980 charges of assault and his name
13 wholly cleared. Thereafter, Plaintiff was restored to his
14 position in the Riverside Mission.

15
16 23. In 1982, as a result of his growing awareness that
17 Scientology, the Defendant CHURCH and the Managing Agents were a
18 fraudulent and violent group, Plaintiff broke away from the
19 Church of Scientology and led the Riverside Mission to do the
20 same.

21
22 24. Subsequent to this breaking away, Hubbard and his
23 successors, MISCAVIGE, STARKEY and SPURLOCK conspired to
24 undertake a campaign to harass and defame Plaintiff and to
25 destroy the new church he had established, the Church of
26 Sciologos. This conspiracy was commenced when in December 1982,
27 the CHURCH Defendants ordered certain individuals to sue
28

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EXHIBIT B

1 Plaintiff and others and to claim ownership of the building
2 belonging to the Church of Sciologos.
3

4 25. The conspiracy was furthered in late 1985 when, at a
5 meeting attended by MISCAVIGE, STARKEY and SPURLOCK and other,
6 DAVID MISCAVIGE ordered that Plaintiff be physically attacked and
7 his group disrupted.
8

9 26. This plan was carried out on numerous occasions in 1985
10 and 1986 when Plaintiff was physically attacked. In February
11 1986, a high ranking Scientologist named DENNIS CLARK entered the
12 Church of Sciologos looking for Plaintiff and, when he couldn't
13 find him, physically attacked another person, Marc Chacon.
14

15 27. This plan was carried out by repeated invasions into
16 the Church of Sciologos by Scientologists posing threats to
17 persons legitimately therein, taking photographs of individuals
18 whose privacy was intruded on, climbing onto the roof, and by
19 provoking fights. The most recent of these events occurred in
20 April 1988.
21

22 28. In 1985 Plaintiff began writing a book about
23 Scientology and its founder, L. Ron Hubbard, which was published
24 in August, 1987 under the title L. Ron Hubbard: Messiah or
25 Madman?. Hubbard and the Managing Agents (MISCAVIGE, STARKEY and
26 SPURLOCK) received information about this from spies planted with
27 Sciologos, Plaintiff's new church, and from Plaintiff's co-
28 author, Hubbard's estranged son, Ron DeWolf.

EXHIBIT B

1 FIRST CAUSE OF ACTION

2 (Against All Defendants For Intentional
3 Interference With Prospective Economic
4 Advantage.)
5

6 29. Plaintiff realleges paragraphs 1 through 28, as though
7 fully restated.
8

9 30. As Plaintiff's book neared completion, the Defendants'
10 fair game conspiracy plan, as directed by the Managing Agents,
11 was expanded to include the goal of impeding the conclusion of
12 the book, interfering with the publicity surrounding the release
13 of the book, interfering with the dissemination and inducing
14 DeWolf to breach his contract to participate in writing the book.
15 This plan constituted an intentional interference with
16 Plaintiff's prospective economic advantage from his book.
17

18 31. In furtherance of this plan, on information and belief,
19 all Defendants, but particularly BRIDGE PUBLICATIONS coerced
20 various bookstore chains, e.g., Waldenbooks into not carrying
21 Plaintiff's book.
22

23 32. Pursuant to the conspiracy, on or about August 6, 1988,
24 TIMOTHY BOWLES delivered a letter to the St. Petersburg Times
25 containing threatening language intending to dissuade that
26 newspaper from publishing a review of BENT CORYDON's book. His
27 letter stated in pertinent part:
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EXHIBIT B

1 "We have evidence that your paper has a deep-
2 seated bias against the Church and intend to
3 hit the Church hard with this review. You are
4 the only even semi-major paper that is
5 bothering to consider a review of this book.
6 In light of this it is quite apparent and can
7 be proved that your motives in reviewing this
8 book are not literary or for putting forth
9 "news," but are to attack and denigrate the
10 Church through any vehicle you find available.

11
12 Corydon's book is so scandalous, full of
13 lies and unprofessional that no major
14 publication has touched it. If you forward
15 one of his lies you will find yourself in
16 court facing not only libel and slander
17 charges, but also charges for conspiracy to
18 violate civil rights. If you publish anything
19 at all on it, you may still find yourself
20 defending charges in court in light of what we
21 know about your intentions. We know a whole
22 lot more about your institution and motives
23 than you think."

24
25 This incident is known only because the St. Petersburg Times was
26 not cowed by the threat and published this letter alongside its
27 review of L. Ron Hubbard: Messiah or Madman? However, Plaintiff
28 believes and thereon alleges that similar threats were made by

EXHIBIT B

1 BOWLES and other Defendants to other newspapers and broadcast
2 media to suppress publicity and dissemination of the book.
3

4 33. For example, Defendants conspired to prevent Plaintiff
5 from appearing on radio talk shows about his book. Specifically,
6 in order to prevent his appearance on the radio station of
7 Pasadena City College, Shirely Young, president of the church of
8 Scientology-Los Angeles telephoned that radio station and falsely
9 stated that another radio station on which Plaintiff had appeared
10 received a bomb threat because of Plaintiff's appearance. That
11 statement was wholly false.
12

13 34. Because threats or lies similar to those described in
14 paragraphs 22 and 34, a television interview by KATV in Portland,
15 Oregon was cancelled as was an interview with KING in Seattle,
16 Oregon. Also, the Portland Oregonian which had considered doing
17 a story on the cancellations, abruptly changed its mind.
18 Plaintiff believes and thereon alleges that these cancellations
19 were all induced by threats made by all Defendants in furtherance
20 of the conspiracy to interfere with Plaintiff's prospective
21 advantage.
22

23 35. In furtherance of the conspiracy Defendants conspired
24 to defame Plaintiff and discredit his book calling him a criminal
25 and a liar on various talk shows and in print media as
26 hereinafter alleged.
27

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EXHIBIT B

1 36. In furtherance of the conspiracy, Defendants organized
2 Scientologists drones to know in advance the time of radio
3 station interviews so that they could jam the telephone lines and
4 prevent a fair exchange of public reactions to the book.
5

6 37. In furtherance of his conspiracy, Defendants entered
7 into a contract with Hubbard's estranged son, Ron DeWolf, who was
8 collaborating with Plaintiff on the book, to breach his contract
9 with Plaintiff and his publisher and to refuse to continue
10 collaborating on the book and to sue the publisher for including
11 his name as a co-author.
12

13 38. Each of the acts described in paragraphs 31-37
14 demonstrate a knowledge of Plaintiff's prospective economic
15 advantage from the publication and sale of his book, and indicate
16 a series of intentional acts designed to interfere with that
17 prospective economic advantage. These acts did cause such
18 interference and damage and were not within any privilege of fair
19 competition. Furthermore, these acts intended to oppress the
20 exercise of the First Amendment rights, not only of Plaintiff,
21 but of the public insofar as it intentionally interfered with the
22 public's "right to know". As such, the conduct of Defendants
23 herein entitles Plaintiff to both compensatory damages, according
24 to proof, and punitive damages.
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SECOND CAUSE OF ACTION

(Against All Defendants for Libel Per Se)

39. Plaintiff realleges paragraphs 1 through 28, 30 and 35 as if fully restated.

40. Pursuant to the conspiracy to interfere with Plaintiffs economic advantage and to defame him, on or about August 5, 1988, Defendant HEBER JENTZSCH, acting as President of the Church of Scientology International, telexed a statement to the St. Petersburg Times that Plaintiff has a criminal record.

41. That statement is untrue, defamatory on its fact, known to be false when published by JENTZSCH, unprivileged, tending to cause harm to plaintiff both personally and professionally and did cause harm.

42. JENTZSCH's statement was intended to oppress and malign Plaintiff as part of the conspiracy hereinabove described.

43. Wherefore, Plaintiff has been damaged in an amount according to proof and is entitled to punitive damages.

THIRD CAUSE OF ACTION

(Against All Defendants for Slander)

44. Plaintiff realleges herein the allegations of paragraphs 1 through 28, 30 and 35 as though fully restated.

EXHIBIT B

1 45. In August of 1987, HEBER JENTZSCH appeared on a CNN
2 broadcast with BENT CORYDON and stated:

3 "I have here his arrest record for assault
4 with a deadly weapon when he tried to run over
5 a Riverside County Sheriff. Not only that, I
6 mean with this kind of thing going on with
7 freeway attacks right now and people shooting
8 people, this man has a criminal record, I CNN
9 has to put that out there and let people know
10 that he does have a criminal record, I have it
11 right here . . . "

12
13 46. The foregoing statement was false when made, known by
14 JENTSCH to be false, and unprivileged. Further, they falsely
15 charged Plaintiff with having been convicted of a crime and
16 injured him in respect to his profession.

17
18 47. JENTZSCH's statement was intended to slander, to malign
19 and oppress Plaintiff pursuant to the above described conspiracy.

20
21 48. Wherefore Plaintiff has been damaged in an amount
22 according to proof and is entitled to punitive damages.

23
24 FOURTH CAUSE OF ACTION

25 (For Slander Against All Defendants)

26
27 49. Plaintiff realleges paragraphs 1 through 28, 30 and 35
28 as though fully restated herein.

 EXHIBIT B

1 50. On or about August 10, 1987, on a program called
2 Straight Talk on WOR-NY, Mr. JENTZSCH stated:

3 "First of all, here is a police report where
4 you [CORYDON] are charged with assault with a
5 deadly weapon upon a police officer, isn't
6 that true? . . .

7
8 "The police report has to do . . . I want it
9 known the man who is sitting here has a
10 criminal record. He has a criminal record
11 that's a court document report there

12
13 . . . I want it understood that WOR-TV should
14 have the responsibility of saying that the
15 person who makes the accusations does have a
16 criminal record. And that's not the only
17 thing . . . "

18
19 BENT CORYDON: I do not have a criminal
20 record.

21
22 JENTZSCH: He's lying."

23
24 51. The foregoing statements of HEBER JENTZSCH were false,
25 known by JENTZSCH to be false and unprivileged and further, they
26 falsely charged Plaintiff with having been convicted of a crime
27 and injured him in his profession.

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EXHIBIT B

1 52. Mr. JENTZSCH made those statements with an intent to
2 slander, malign and oppress Plaintiff pursuant to the above-
3 described conspiracy.
4

5 53. Wherefore Plaintiff has been damaged in an amount
6 according to proof and is entitled to punitive damages.
7

8 FIFTH CAUSE OF ACTION

9 (Against All Defendants for Invasion of Privacy)
10

11 54. Plaintiff realleges paragraphs 1 through 28, 30 and 35
12 as though fully restated.
13

14 55. Plaintiff had a statutory right to seek an expungement
15 of his only criminal conviction. He exercised that right and the
16 record of his arrest and conviction were expunged. Each
17 Defendant knew of that expungement.
18

19 56. The history of that arrest and conviction was a matter
20 of extreme personal sensitivity. Such expungements are intended
21 to protect a person from unfair labeling as a criminal by society
22 for a single mistake. The purpose of the expungement therefore
23 is to preserve as undisclosable a matter of great personal
24 importance.
25

26 57. Defendants' knowledge of the expungement was based on
27 the notice of the expungement given to them by Plaintiff which
28 notice was necessary prior to Plaintiff's reinstatement to the

EXHIBIT B

1 Riverside Mission since it is Defendant's policy that a person
2 with a criminal record cannot hold the position of mission
3 holder. As purported Church authorities^s with fiduciary duties to
4 their members, the Church Defendants had a duty not to disclose
5 such information.

6
7 58. In addition to Defendants' conspiracy to defame
8 Plaintiff, Defendants intended to broadcast the very private
9 information about Plaintiff with the intent to offend and harm
10 Plaintiff and cause him to extreme emotional distress.

11
12 59. The public disclosure of these private facts was an
13 intentional abuse of Defendants' knowledge of private
14 information; was not of legitimate public concern; and had no
15 bearing on the credibility of Plaintiff's book, L. Ron Hubbard:
16 Messiah or Madman?

17
18 60. Plaintiff suffered an impairment of his peace of mind,
19 an extreme discomfort more acute than bodily injury and
20 humiliation, all of which were intended by Defendants
21

22
23 61. Therefore, Plaintiff seeks compensatory damages
24 according to proof and punitive damages.

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1 64. Said statements were untrue, known to be untrue,
2 unprivileged, accused Plaintiff of several crimes and was harmful
3 to Plaintiff in his business and reputation and did cause harm.
4

5 65. Said statements were made with the intent to defame,
6 malign and oppress Plaintiff.
7

8 66. Wherefore Plaintiff has been damaged in an amount
9 according to proof and is entitled to punitive damages.
10

11 SEVENTH CAUSE OF ACTION

12 (Against All Defendants for
13 Intentional Interference with Contract)
14

15 67. Plaintiff alleges paragraphs 1 through 28, 30 and 35 as
16 though fully restated herein.
17

18 68. In 1986, Defendants knew that Plaintiff had contracted
19 with Hubbard's estranged son, L. Ron Hubbard, Jr. aka Ron De Wolf
20 for De Wolf's participation in the writing of Plaintiff's book.
21

22 69. Pursuant to the conspiracy hereinabove described,
23 Defendants did induce De Wolf to break that contract and to
24 refuse further participation in the book and to demand that his
25 name be removed from the book.
26

27 70. De Wolf did breach said contract and Plaintiff has been
28 injured thereby.

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1 71. Wherefore, Plaintiff seeks compensatory damages in an
2 amount according to proof and punitive damages.

3
4 EIGHTH CAUSE OF ACTION

5 (Interference with Prospective Economic Advantage
6 Against All Defendants Except Timothy Bowles)

7
8 72. Plaintiff realleges by this reference and incorporates
9 herein paragraphs 1 through 28 and 30, inclusive, and by this
10 reference makes them a part hereof.

11
12 73. As the starting point for the conspiracy described in
13 paragraphs 24 through 28, above, Defendants planned to steal from
14 Sciologos those parishioners who indicated their interest in
15 joining in its separation from the CHURCH. The economic
16 viability of Sciologos and Plaintiff depended on the income
17 derived from those parishioners and payments made for services
18 and courses. Each Defendant had knowledge of the names of the
19 parishioners and of their relationship with SCIOLOGOS.

20
21 74. Several meetings were sponsored by Defendants to which
22 Sciologos parishioners were invited and at which Cross-Defendants
23 slandered the leadership of Sciologos. This slander included
24 accusing BENT CORYDON and others of misuing funds belonging to
25 the Riverside Mission. These statements were untrue,
26 unprivileged, known to be untrue, accused Plaintiff of several
27 crimes, was harmful to Bent Corydon in his profession and/or
28 business and did cause harm.

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1 75. In addition to slandering the Sciologos' leaders,
2 Defendants threatened parishioners into defecting from Sciologos.
3 One of the threats frequently used was the threat of disclosure
4 of information from the parishioners' confessional files, which
5 information which was obtained under the cloak of the
6 priest/penitent privilege.
7

8 76. Thereafter, the conspiracy included numerous acts over
9 a long period of time, up to the present, designed to demean
10 Sciologos and BENT CORYDON in the community, to impair Sciologos'
11 economic viability, and to render its building a place in which
12 people feared for their safety. Such acts include the following:

13 (a) In 1984 Defendants encouraged and required certain
14 ex-parishioners to file unwarranted lawsuits against Sciologos
15 for refunds in an effort to deplete its resources and overwhelm
16 the staff;

17 (b) In 1985 DAVID MISCAVICH put into operation a
18 standing order to Scientologist co-conspirators and DOES 5
19 through 50 to physically attack BENT CORYDON and to disrupt
20 Sciologos' operations;

21 (c) In February 1986, pursuant to the MISCAVICH
22 standing order, a Scientologist named Dennis Clark entered the
23 Sciologos building in Riverside and, after starting a loud
24 argument, attacked one of the staff members of Sciologos. Then,
25 as he was leaving the parking lot, he deliberately drove his car
26 towards another member of the Sciologos staff who was recording
27 the license plate of the car;

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1 (d) On several occasions, persons identified as
2 Scientologists, e.g., Patrick Ward, have entered en masse onto the
3 Sciologos premises for the purpose of harassing people present
4 there for legitimate purposes. This harassment was accomplished
5 by provoking arguments, taking unwanted photographs, opening
6 private doors, and photographing the occupants in the rooms
7 thereby opened, and otherwise threatening the security of the
8 people who utilize the SCIOLOGOS premises. The last of these
9 events occurred in April 1988;

10 (e) In 1985, BENT CORYDON was assaulted by
11 Scientologists while standing in a telephone booth near the
12 Gilman Hot Springs headquarters of Scientology;

13 (f) In 1986, BENT CORYDON was shoved by Scientologists
14 in the federal courthouse in Los Angeles where he was present to
15 observe proceedings in Scientology-related litigation.

16
17 77. As a result of each of the conspiratorial acts
18 described in paragraphs 24 through 28, 30 and 71 through 75(a)-
19 (f), the economic relationship between and among Sciologos and
20 many of its parishioners and its potential parishioners was
21 destroyed. Consequently, BENT CORYDON has suffered a substantial
22 loss of income in an amount to be proved.

23
24 78. Insofar as the acts of the conspiracy were
25 intentionally designed to impair Plaintiff in his profession, his
26 rights of free speech and the exercise of his freedom of
27 religion, Plaintiff also seeks punitive damages.

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1 WHEREFORE, Plaintiff prays for judgment against Defendants,
2 and each of them, as follows:

3 1. General damages in a sum according to proof at time of
4 trial in excess of the minimum jurisdictional amount of this
5 Court;

6 2. All statutory damages in a sum in excess of the minimum
7 jurisdictional amount of this Court;

8 3. All special damages according to proof at time of
9 trial;

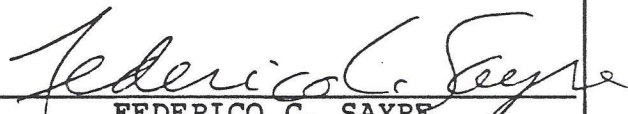
10 4. All exemplary and punitive damages in an amount
11 according to proof at time of trial;

12 5. For costs of suit and attorney's fees incurred herein;

13 6. For such other and further relief as the court may deem
14 just and proper.

15
16 DATED: December 7, 1988.

17 SAYRE, MORENO, PURCELL & BOUCHER

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19 
20 FEDERICO C. SAYRE
21 Attorneys for Plaintiff
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I, EVELYN TAYLOR, am a resident of/employed in the aforesaid county, State of California. I am over the age of 18 years and not a party to the within action. My business/residence address is: 10866 Wilshire Blvd., Fourth Floor, Los Angeles, California 90024.

By mail I caused such envelope with postage thereon fully paid to be placed in the United States mail at Los Angeles, California.

Executed on December 7, 1988

Welpack

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